

REMARKS

Upon entry of the foregoing Amendment, claims 85-87, 90, 93, 97-102, 104, 124-126, 128, 131, 138-140, and 143-147 are pending in the application. Claims 85-87, 90, 93, 97-102, 104, 124-126, 128, 131, 138-140, and 143-147 have been amended. Claims 89, 91, 95-96, 103, 105, 127, 129-130, 132, and 141-142 have been cancelled. No claims have been newly added. Applicants believe that this Amendment does not add new matter. In view of the foregoing Amendment and the following Remarks, allowance of all the pending claims is requested.

SPECIFICATION OBJECTIONS

The Examiner has objected to the specification under 37 C.F.R. § 1.75(d)(1) and MPEP § 608.01(o). In particular, the Examiner has indicated that correction is required for the terms "indexing tracking ID," "indexing tracking ID request," "tracking identification string allocation module," "tracking number request module," and "USPS delivery confirmation code," which were previously recited in the claims. Office Action, pages 2-3.

Solely for purposes of expediting prosecution of this application, and without acknowledging the propriety of the alleged basis for the objection, Applicants note that the claims have been amended as indicated above, and that the currently pending claims do not recite the terms that form the alleged basis for the objection to the specification.

Accordingly, for at least the reason that the amendments to the claims fully address the Examiner's alleged basis for the objection, the specification satisfies the requirements of 37 C.F.R. § 1.75(d)(1) and MPEP § 608.01(o). Applicants therefore request that the Examiner withdraw the objections to the specification.

REJECTION UNDER 35 U.S.C. § 112, FIRST PARAGRAPH

The Examiner has rejected claims 85-87, 89-91, 93, 95-105, 124-132, and 138-147 under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the written description requirement. In particular, the Examiner alleges that the previously pending claims recited various terms that were not described in such a way as to reasonably convey that Applicants

had possession of the claimed invention at the time the application was filed. Office Action, pages 3-5.

Applicants initially note that the rejection has been rendered moot with respect to cancelled claims 89, 91, 95-96, 103, 105, 127, 129-130, 132, and 141-142. In addition, Applicants submit that the rejection of currently pending claims 85-87, 90, 93, 97-102, 104, 124-126, 128, 131, 138-140, and 143-147 is improper and should be withdrawn for at least the reason that the currently pending claims comply with the written description requirement.

More particularly, solely for purposes of expediting prosecution of this application, and without acknowledging the propriety of the alleged basis for the rejection, Applicants note that the claims have been amended as indicated above, and that the currently pending claims do not recite the terms that form the alleged basis for the rejection.

Accordingly, for at least the reason that the amendments to the claims fully address the Examiner's alleged basis for the rejection, the currently pending claims comply with the written description requirement. Applicants therefore request that the Examiner withdraw this rejection of the claims.

REJECTION UNDER 35 U.S.C. § 112, SECOND PARAGRAPH

The Examiner has rejected claims 93 and 124-146 under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. In particular, the Examiner alleges that the previously pending claims recited various terms that were unclear or otherwise ambiguous. Office Action, pages 5-6.

Applicants initially note that the rejection has been rendered moot with respect to cancelled claims 127, 129-130, 132, and 141-142. In addition, Applicants submit that the rejection of currently pending claims 93, 124-126, 128, 131, 138-140, and 143-146 is improper and should be withdrawn for at least the reason that the currently pending claims are clear and definite, particularly pointing out and distinctly claiming the subject matter which Applicants regard as the invention.

More particularly, solely for purposes of expediting prosecution of this application, and without acknowledging the propriety of the alleged basis for the rejection, Applicants note that the claims have been amended as indicated above, and that the currently pending claims do not recite the terms that form the alleged basis for the rejection.

Accordingly, for at least the reason that the amendments to the claims fully address the Examiner's alleged basis for the rejection, the currently pending claims are clear and definite. Applicants therefore request that the Examiner withdraw this rejection of the claims.

REJECTION UNDER 35 U.S.C. § 103

The Examiner has rejected claims 85-87, 89-91, 93, 95-105, 124-132, and 138-147 under 35 U.S.C. § 103 as allegedly being unpatentable over U.S. Patent No. 6,005,945 to Whitehouse ("Whitehouse") in view of "An Introduction to Cryptography" ("Cryptography"). Office Action, pages 6-14.

Applicants initially note that the rejection has been rendered moot with respect to cancelled claims 89, 91, 95-96, 103, 105, 127, 129-130, 132, and 141-142. In addition, Applicants submit that the rejection of currently pending claims 85-87, 90, 93, 97-102, 104, 124-126, 128, 131, 138-140, and 143-147 is improper and should be withdrawn for at least the reason that Whitehouse and Cryptography, either alone or in combination, fail to disclose, teach, or suggest each and every feature of the claimed invention, as amended.

More particularly, Whitehouse and Cryptography, either alone or in combination, do not appear to disclose, teach, or suggest at least the feature of "allocating a unique tracking number to [a] requested postage transaction, wherein the unique tracking number allocated to the postage transaction provides a mail piece tracking capability within the United States Postal Service (USPS)," "generating . . . a unique postage indicium for the requested postage transaction, wherein the unique postage indicium contains the unique tracking number allocated to the postage transaction," and "indexing [] information stored for the postage transaction in [a] database with the unique tracking number allocated to the postage transaction," as recited in amended independent claim 85. For example, as further recited in amended independent claim 85, the foregoing features may permit the United States Postal

Service (USPS) to validate "a mail piece carrying the unique tracking number" with the information indexed with the unique tracking number in the database.

Although Whitehouse generally describes a system that generates "postal indicia in response to postage requests submitted by end user computers," wherein a postal authority may then "process[] the postal indicia on mail pieces" (Abstract), Whitehouse does not appear to specifically describe "allocating a unique tracking number" in response to the postage requests. Moreover (and consequently), Whitehouse does not appear to further indicate that postal indicia generated in response to postage requests "contain[] the unique tracking number allocated to the postage transaction" and that information stored for the postage transaction is indexed with the unique tracking number. Rather, to the extent that Whitehouse describes "mail piece tracking" within the USPS, Whitehouse appears to only generally indicate that "[t]racking of mail pieces can actually begin prior to the piece being actually physically transferred to the care of the postal agency" (col. 24, lines 46-52).

However, the general description in Whitehouse that relates to mail piece tracking does not appear to specifically disclose, teach, or suggest "allocating a unique tracking number" to a postage transaction, generating "a unique postage indicium [that contains the unique tracking number] for the requested postage transaction," and then indexing information stored for the postage transaction (including the unique postage indicium) with the unique tracking number. For example, the Examiner alleges that the Table in Whitehouse at col. 13, lines 23-36 shows a "serial number" corresponding to the previously recited "indexing tracking ID," which has been amended to the "unique tracking number," and further alleges that Whitehouse illustrates "allocating" the previously recited "indexing tracking ID" in Figure 5A, step 214.

Regarding the former allegation that the "serial number" corresponds to the currently recited "unique tracking number," Applicants note that the "serial number" described in Whitehouse relates to the postage indicium itself. Similarly, regarding the latter allegation that Whitehouse illustrates allocating the currently recited "unique tracking number" in Figure 5A, Applicants further note that Whitehouse illustrates a postage request verification procedure in Figure 5A, wherein step 214 includes transmitting an "indicium message" to a user requesting a postage indicium. Therefore, because the portions in Whitehouse relied upon by the Examiner

appear to describe various procedures and characteristics that relate to a "postage indicium," the relied upon portions in Whitehouse do not appear to describe allocating a "unique tracking number [that] provides a mail piece tracking capability within the United States Postal Service" and subsequently using the unique tracking number to index information stored for a postage transaction to which the unique tracking number was allocated.

Cryptography fails to cure the foregoing deficiencies of Whitehouse for at least the reason that the Examiner has only relied upon Cryptography as allegedly showing that "any data can be incorporated into a digital signature" that can then be used to verify the data. Thus, even assuming *arguendo* that the Examiner has correctly characterized Cryptography, which Applicants do not concede, whether or not Cryptography describes verifying data with a digital signature does not particularly relate to the foregoing features that recite "allocating a unique tracking number" to a postage transaction and indexing information stored for the postage transaction with the unique tracking number. For at least this reason, Cryptography fails to cure the foregoing deficiencies of Whitehouse.

Accordingly, for at least the foregoing reasons, Whitehouse and Cryptography, either alone or in combination, fail to disclose, teach, or suggest each and every feature of amended independent claim 85. The rejection is therefore improper and should be withdrawn.

Independent claims 124 and 147 have been amended to recite features similar to those set forth in amended independent claim 85. Claims 86-87, 90, 93, 97-102, 104, 125-126, 128, 131, 138-140, and 143-146 depend from and add features to one of amended independent claims 85 and 124. Thus, the rejection of these claims is likewise improper and should be withdrawn for at least the same reasons.

CONCLUSION

Having addressed each of the foregoing rejections, it is respectfully submitted that a full and complete response has been made to the outstanding Office Action. As such, the application is in condition for allowance. Notice to that effect is respectfully requested.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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Respectfully submitted,

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